

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Edward V. Weis Debtor	Chapter 13 Bankruptcy No. 20-11161-mdc
PennyMac Loan Services, LLC, or its Successor or Assignee	
Movant	
vs.	
WILLIAM C. MILLER, Esq., Trustee	
Edward V. Weis	
Respondents	

**MOTION OF PENNYMAC LOAN SERVICES, LLC, OR ITS SUCCESSOR OR ASSIGNEE FOR
RELIEF FROM AUTOMATIC STAY UNDER § 362(a)**

Movant: PennyMac Loan Services, LLC, or its Successor or Assignee

Mortgage dated August 20, 2015 and recorded on August 31, 2015 in the Office of the Recorder of Delaware County in Mortgage Book 05695 Page 1918.

Assignment of Mortgage dated August 6, 2019 and recorded on August 22, 2019 in the Office of the Recorder of Delaware County in Mortgage Book 6376 Page 0519.

1. PennyMac Loan Services, LLC, or its Successor or Assignee (hereinafter "Movant") holds a claim secured by a duly recorded Mortgage on property of Edward V. Weis, or of the bankruptcy estate located at: 1223 Anderson Avenue, Trainer, Pennsylvania 19061.

2. Edward V. Weis (hereinafter "Debtor") filed a Petition under Chapter 13 on February 26, 2020.

3. At the present time, the Mortgage requires payments each month of \$1,135.75.

4. Movant has not received regular mortgage payments and lacks adequate protection of its interests.

5. Debtor is in default of post petition payments to the present date from May 2021.

6. The total amount of the post-petition arrearage as of this date is \$3,312.27. This figure is broken down as follows:

-Three (3) delinquent payments, each in the amount of \$1,135.75, representing the months of May 2021 through July 2021

-Less suspense balance of \$94.98

7. Since July 15, 2021, Movant has incurred attorneys' fees in connection with this Motion.

8. Movant does not have and has not been offered adequate protection for its interest in said premises and may be required to pay expenses for said premises in order to preserve its lien, which is the obligation of the Debtor under said Mortgage.

9. Movant specifically requests permission from the Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law.

WHEREFORE, Movant prays for an order modifying the automatic stay of Bankruptcy Code '362(a) to permit Movant to exercise applicable state court remedies with respect to the mortgage property and for such relief as this Court deems necessary and appropriate.

/s/ Lauren M. Moyer, Esquire
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